

The amendment to claim 187

Lines 5-8 of claim 187 as amended on March 13, 2006 recites "representations of model entities", "hierarchies", and "information", i.e., the latter are not "representations of hierarchies" or "representations of information". The "of the hierarchies" and "of the information" language in line 12 as amended on March 13 is thus grammatically in error; Applicant has remedied the problem by removing the "of's".

Traversal of the rejections under 35 U.S.C. 102(e)

The rejections of claims 187 and 198

As set forth in the *Abstract*, the Buteau reference discloses a system that evaluates an enterprise architecture to see how architectural changes to the enterprise affect the enterprise architecture. The enterprise architecture is represented using tables in a relational database system and includes a work flow model, an information model, and a technology model. The enterprise architecture itself is based on the Department of Defense's Technical Architecture Model for Information Management (TAFIM). Buteau's FIG. 2 shows the TAFIM model. As can be seen from FIG. 2 and the discussion of FIG. 1 at col. 1, lines 23-35, the TAFIM model is concerned with an enterprise's infrastructure, not with managing whatever it is that the enterprise is using the infrastructure to do. This concern with infrastructure is also apparent from the user interface shown at FIGs. 8-10. FIG. 8 shows a screen for inputting information about locations belonging to the enterprise; FIG. 9 shows an SQL query that is used in Buteau's system to return information about all processes that relate to customer data. FIG. 10 shows the result of the query. As is apparent from FIG. 9, users who wish to obtain information from Buteau's system must be extraordinarily skilled in SQL (see col. 22, lines 55-62). Buteau's system is in short not for use by the average member of the enterprise whose architecture is being modeled.

As is clear from the foregoing, Buteau's system is not about "supporting management of a business by persons involved therein" and its model is not "a model of the

fig 4
C2L53-54
fig 5
C14L28-33

business" (claim 187) and consequently cannot anticipate claim 187. Other limitations of claim 187 that are not disclosed in Buteau include the following:

- the user interface of FIGs. 8-10 does not "respond to the first inputs by outputting the representations of the model entities, the hierarchies, and/or the information to which the model entities provide access in tangible form" (claim 187, lines 111-14) and there is no hint of such a user interface in Buteau. Buteau discloses screens which permit the user to input information about entities (FIG. 8, col. 22, lines 20-31) and screens for inputting SQL queries (FIG. 9) and displaying the results of the queries (FIG. 10, col. 22, lines 33-62), but there is no disclosure whatever of an interface that outputs "the representations of the model entities, the hierarchies, and/or the information to which the model entities provide access in tangible form."
- the representations of the model entities do not provide access to information (claim 187, lines 8 and 9). As disclosed, the only way to get information out of Buteau is to write an SQL query.

Because Buteau does not disclose the foregoing limitations of claim 187, it cannot serve as a basis for the rejection of the claim under 35 U.S.C. 102(e). Examiner will immediately see that similar arguments apply with regard to claim 198. The dependent claims are patentable because the claims they are dependent from are patentable. With regard to dependent claims 199-209, these claims describe various aspects of the GUI used in Applicants' system (see FIGs. 6-9, 12-35) and cannot reasonably be construed to read onto Buteau's SQL query interface.

Traversal of the objection to claims 197 and 210

These claims are Beauregard claims written in dependent form. Applicant's attorney has been using such claims for at least five years now and knows of nothing in 35 U.S.C. 112, fourth paragraph, 37 C.F.R. 1.75, or MPEP 608.01(n)(III) which prohibits such claims. The basic rule is set forth in 35 U.S.C. 112, fourth paragraph:

a claim in dependent form shall contain a reference to a claim previously set forth and then specify a further limitation of the subject matter claimed. A claim in dependent form shall be construed to incorporate by reference all the limitations of the claim to which it refers.

37 C.F.R. 1.75 and MPEP 608.01(n)(III) merely restate the above. Claims 197 and 210 both "contain a reference to a claim previously set forth and then specify a further limitation of the subject matter claimed". Taking claim 197 as an example, it reads as follows:

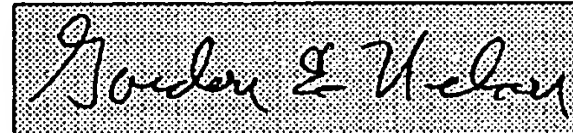
197. (previously presented) A data storage device, the data storage device being characterized in that:
the data storage device contains a program which, when executed in a computer system, implements the system set forth in claim 187.

5 It contains a reference to claim 187 and the language "implements the system set forth in claim 187" necessarily means that claim 197 includes all of the limitations of claim 187. The "further limitation" is that the system of claim 197 is implemented in a program contained in the data storage device. Claim 197, and claim 210, which is like claim 197 except that it refers to claim 198, are thus both perfectly proper dependent claims by the standards set forth in the patent statute, the patent rules of practice, and the MPEP.

Conclusion

Applicant has amended his claims to remedy a grammatical mistake and has traversed the rejection of the claims under 35 U.S.C. 102(e) and the objection to claims 197 and 210 as being improper dependent claims. Applicant has thus been completely responsive to Examiner's final Office action of 4/7/2006. No fees are believed to be required for this amendment. Should any be, please charge them to deposit account number 501315.

Respectfully submitted,

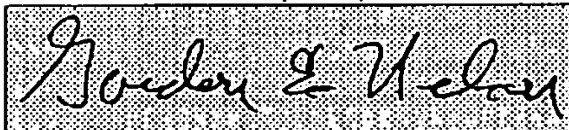


Attorney of record,
Gordon E. Nelson
57 Central St., P.O. Box 782
Rowley, MA, 01969,
Registration number 30,093
Voice: (978) 948-7632
Fax: (866) 723-0359
6/12/06
Date

Certificate of Transmission

I hereby certify that this correspondence is being facsimile transmitted to the United States Patent and Trademark Office, Fax No. 571-273-8300 on 6/12/06
(Date)

Gordon E. Nelson, #30,093



(Signature)

claims 1-125: canceled

claims 126-186: canceled

1 187. (currently amended) A system for supporting management of a business by
2 persons involved therein,
3 the system comprising:

4 a processor which has access to a representation of a model of the
5 business, the model including representations of model entities, a given
6 representation of a model entity being capable of simultaneously belonging to
7 hierarchies including a hierarchy and another hierarchy, and the representations of
8 model entities providing access to information relating to the business; and

9 an interface to the system for a person of the persons, the interface being
10 provided by the processor and the interface receiving first inputs from the person,
11 the processor responding to the first inputs by outputting the representations of the
12 model entities, ~~of the~~ hierarchies, and/or ~~of the~~ information to which the model
13 entities provide access in tangible form and further receiving second inputs from
14 the person to which the processor responds by modifying the representations of
15 the model entities, the hierarchies, and/or the information to which the
16 representations of the model entities provide access.

1 188. (previously presented) The system set forth in claim 187 wherein: the first inputs
2 further include inputs to which the processor responds by sorting the representations of
3 the model entities according to the representations' hierarchy membership.

1 189. (previously presented) The system set forth in claim 187 wherein:
2 a representation of a model entity includes representations of the information.

1 190. (previously presented) The system set forth in claim 189 wherein:
2 the first inputs further include inputs to which the processor responds by sorting
3 the representations of the model entities according to values of the included
4 representations of the information.

1 191. (previously presented) The system set forth in claim 187 wherein:
 2 there is a plurality of types of model entities;
 3 a representation of a model entity specifies the represented model entity's type.

1 192. (previously presented) The system set forth in claim 187 wherein:
 2 the model further includes representations of further information that are related
 3 to certain of the representations of the model entities;
 4 the processor responds to further inputs of the first inputs by outputting the
 5 representations of the further information and receives further inputs of the second inputs
 6 to which the processor responds by accessing the related further information.

1 193. (previously presented) The system set forth in claim 192 wherein:
 2 the interface further receives still further inputs of the second inputs to which the
 3 processor responds by modifying the further information.

1 194. (previously presented) The system set forth in claim 193 wherein:
 2 the further information is a document that is accessible to the system.

1 195. (previously presented) The system set forth in claim 193 wherein:
 2 the further information is a message sent to the person by another person.

1 196. (previously presented) The system set forth in claim 194 wherein:
 2 the further information is a discussion concerning the model entity among the
 3 persons.

1 197. (previously presented) A data storage device, the data storage device being
 2 characterized in that:
 3 the data storage device contains a program which, when executed in a computer
 4 system, implements the system set forth in claim 187.

1 198. (previously presented). A method of supporting management of a business in a
2 system which includes a processor, the processor having access to a database containing a
3 model of the business, the model including representations of model entities, a given
4 representation of a model entity being capable of simultaneously belonging to
5 hierarchies including a hierarchy and another hierarchy, and the representations of model
6 entities providing access to information relating to the business, the processor providing
7 an interface for one or more users of the system, and the method comprising the steps
8 performed in the system of:

9 receiving a definition of a model entity belonging to a model of the business from
10 a person involved in the business via the interface and responding thereto by producing a
11 representation of the model entity in the database; and

12 receiving a first indication of a first hierarchical relationship between the model
13 entity and another model entity belonging to the hierarchy via the interface and
14 responding thereto by using the interface to relate the model entity to the other model
15 entity in the hierarchy and

16 receiving a second indication of a second hierarchical relationship between the
17 model entity and a third model entity belonging to the other hierarchy via the interface
18 and responding thereto by using the interface to relate the model entity to the third model
19 entity in the other hierarchy.

1 199. (previously presented) The method set forth in claim 198 further comprising the
2 step of:

3 receiving an indication from the person via the interface that one or the other of
4 the hierarchical relationships is to be shown in the interface and responding thereto by
5 showing the indicated relationship in the interface.

1 200. (previously presented) The method set forth in claim 198 wherein:

2 the hierarchy and the other hierarchy are different types of hierarchical
3 relationships.

1 201. (previously presented) The method set forth in claim 200 wherein the method
2 further comprises the steps of:

3 receiving a third indication from the person via the interface of the type of
4 hierarchical relationship to be used in displaying the model entity in the interface; and
5 responding thereto by displaying the model entity in the interface using the
6 indicated hierarchical relationship.

1 202. (previously presented) The method set forth in claim 199 wherein:

2 the indicated hierarchical relationship is shown in the interface by displaying
3 model entities as sorted by the relationship.

1 203. (previously presented) The method set forth in claim 198 wherein the
2 representation of the model entity includes a representation of information about the
3 business and

4 the method further comprises the steps of:

5 receiving a third indication of the model entity from the person via the interface;

6 receiving a fourth indication of the information from the person via the interface;

7 and

8 responding thereto by producing the representation of the information in the
9 representation of the model entity.

1 204. (previously presented) The method set forth in claim 203 further comprising the
2 steps of:

3 receiving a fifth indication from the person via the interface that the information
4 in the representation of the information in the representation of the model entity is to be
5 displayed; and

6 responding thereto by showing the indicated information in the interface.

1 205. (previously presented) The method set forth in claim 203 further comprising the
2 step of:

3 receiving a sixth information from the person via the interface that the
 4 information in the representation of the information in the representation of the model
 5 entity is to be modified; and
 6 responding thereto by permitting the user to modify the information.

1 206. (previously presented) The method set forth in claim 203 further comprising the
 2 steps of: receiving a sixth indication from the person via the interface that the
 3 model entities are to be sorted by values of the information in the representation of the
 4 information in the representation of the model entity; and
 5 responding thereto by showing the sorted model entities in the interface.

1 207. (previously presented) The method set forth in claim 198 further comprising the
 2 steps of:
 3 receiving a third indication from the person via the interface of a model entity;
 4 receiving a fourth indication that further information is to be related to the
 5 indicated model entity; and
 6 responding thereto by relating a representation of the further information to the
 7 representation of the indicated model entity.

1 208. (previously presented) The method set forth in claim 207 further comprising the
 2 steps of:
 3 receiving a fifth indication from the person via the interface that the further
 4 information related to the model entity is to be displayed; and
 5 responding thereto by showing the related further information in the interface.

1 209. (previously presented) The method set forth in claim 208 further comprising the
 2 steps of:
 3 receiving a sixth indication from the person via the interface that the further
 4 information related to the model entity is to be modified; and
 5 responding thereto by modifying the related further information.

- 1 210. (previously presented) A data storage device, the data storage device being
- 2 characterized in that:
- 3 the data storage device contains a program which, when executed in a computer
- 4 system, implements the method set forth in claim 198.